

E X H I B I T "A"

Court of Common Pleas of Philadelphia County

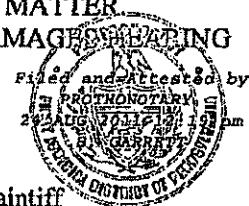
Trial Division

Civil Cover Sheet

PLAINTIFF'S NAME DERRICK BRADLEY		DEFENDANT'S NAME GREYHOUND LINES, INC.
PLAINTIFF'S ADDRESS 2142 N. WANAMAKER STREET PHILADELPHIA PA 19131		DEFENDANT'S ADDRESS C/O CT CORPORATION SYSTEM 116 PINE STREET HARRISBURG PA 17101
PLAINTIFF'S NAME		DEFENDANT'S NAME
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS
PLAINTIFF'S NAME		DEFENDANT'S NAME
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other	<input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT		
STATUTORY BASIS FOR CAUSE OF ACTION		
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) FILED PROPROTHY AUG 24 2011 S. GARRETT		IS CASE SUBJECT TO COORDINATION ORDER? YES NO
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>DERRICK BRADLEY</u> Papers may be served at the address set forth below.		
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY DENNIS A. POMO		ADDRESS 230 S. BROAD STREET SUITE 1901 PHILADELPHIA PA 19102
PHONE NUMBER (215) 665-1900	FAX NUMBER (215) 732-2072	E-MAIL ADDRESS dapesq4u@yahoo.com
SUPREME COURT IDENTIFICATION NO. 48381		DATE SUBMITTED Wednesday, August 24, 2011, 12:19 pm
SIGNATURE OF FILING ATTORNEY OR PARTY DENNIS POMO		

FINAL COPY (Approved by the Prothonotary Clerk)

THIS IS A NON JURY MATTER
ASSESSMENT OF DAMAGES HEARING
IS REQUESTED.



Attorneys for Plaintiff

PASQUARELLA, KUNNEL & POMO, P.C.
Dennis A. Pomo, Esquire
Attorney ID No. 48381
230 South Broad Street, Suite 1901
Philadelphia, PA 19102
(215) 665-1900

DERRICK BRADLEY
2142 N. Wanamaker Street
Philadelphia, PA 19131
Plaintiff
vs.
GREYHOUND LINES, INC.
C/O C T CORPORATION SYSTEM
116 Pine Street
Harrisburg, PA 17101
Defendant

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

AUGUST TERM, 2011

NO.

**NOTICE TO DEFEND
CIVIL ACTION - COMPLAINT
2V - MOTOR VEHICLE CASE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claims in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION CENTER
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY (215)451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Se avisa que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya a sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO
IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE
EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN
PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA
DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA
AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA
LEGAL.

ASSOCIACION DE LICENCIADOS DE FILADELFIA
SERVICIO DE FEFENCIJA E INFORMACION LEGAL
One Reading Center
Philadelphia, PA 19107
Teléfono: (215) 238-6333
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Dennis A. Pomo, Esquire
Attorney ID No. 48381
230 South Broad Street, Suite 1901
Philadelphia, PA 19102
(215) 665-1900

Attorneys for Plaintiff

DERRICK BRADLEY

2142 N. Wanamaker Street
Philadelphia, PA 19131

Plaintiff

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

vs.

AUGUST TERM, 2011

GREYHOUND LINES, INC.
C/O C T CORPORATION SYSTEM
116 Pine Street
Harrisburg, PA 17101

NO.

Defendant

**CIVIL ACTION - COMPLAINT
2V - MOTOR VEHICLE ACCIDENT
COUNT I
PLAINTIFF, DERRICK BRADLEY V. DEFENDANT**

1. Plaintiff, Derrick Bradley is an adult individual residing at the above-captioned address.
2. Defendant, Greyhound Lines, Inc. (hereinafter referred to as "Greyhound"), is a Delaware Corporation, providing, among other things, intra-state and inter-state bus services as a common carrier for hire, regularly conducting business in the County of Philadelphia, Pennsylvania, with its principal office address located at the above-captioned address.
3. On or about August 25, 2009, at approximately 6:00 p.m., the Greyhound bus operated and/or controlled by the defendant, Greyhound, by and through its agent, servant,

workman and/or employee, Guy Scott Crawford on Route 495 East, milepost 155, at or near its intersection with Berline Road, Weehauken, NJ, when it was so carelessly and negligently controlled and/or operated so as to strike the rear of the vehicle operated by Thomas J. Tsilionis in a violent collision, resulting in serious and permanent injuries to the plaintiff, who was a passenger on the Greyhound bus.

4. At all times material hereto, the defendant Greyhound operated its bus by and through its agent, servant and employee, Guy Scott Crawford, who was acting within the scope and duties of his employment.

5. The carelessness and/or negligence of the Defendant, Greyhound Lines, Inc., by and through its agent, servant, workman and/or employee, Guy Scott Crawford, consisted, inter alia, of the following:

- a. driving at an excessive rate of speed under the circumstances;
- b. failing to slow down the vehicle;
- c. failing to exercise the highest duty of care which a common carrier for hire owes to its passengers in the safe operation of its vehicle at all times;
- d. failing to maintain the brakes on the vehicle in proper working condition;
- e. failing to supervise and train its employees and management to discourage placing equipment on the road with known problems, to maintain schedules;
- f. failure to inspect and maintain its vehicle;
- g. failing to maintain in accordance with appropriate Federal rules and regulations the books and records of the defendant at all times;
- h. violating the Federal rules and regulations and the laws of the Commonwealth of Pennsylvania and the City of Philadelphia with respect to safe operation of transportation vehicles;
- (i) failing to have said vehicle under proper and adequate control at the time;
- (j) operating said vehicle in a careless manner without regard for the rights and safety of those lawfully upon the highway;

- (k) failing to give proper and sufficient warning of the approaching of said vehicle;
- (l) otherwise failing to exercise due and proper care under the circumstances.

6. As a result of the motor vehicle accident as aforesaid, the plaintiff, Derrick Bradley sustained severe, serious and grievous injuries to his body, some or all of which may be permanent, including, but not limited to, torn superior labrum of the right shoulder with focal tears of the distal supraspinatus and subscapularis tendons requiring arthroscopy and subacromial decompression, disc herniation at C6-7 and C4-5, C7- T1 disc protrusion, acute sprain and strain of the cervical, thoracic and lumbar spine, strain and sprain of the right knee, as well as severe and extensive damage to his blood vessels, muscles, tissues, and nerves of his head, neck, mid and low back, and severe anxiety and emotional distress, and other injuries to her body, the full extent of which is not yet known.

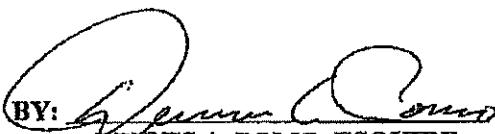
7. As a further result of the accident as aforesaid, the plaintiff has or will be obliged to receive and undergo medical attention and care and to expend and incur various sums of money and expenses for his injuries which he has suffered, and for which he may continue to suffer for an indefinite time into the future.

8. As a further result of the motor vehicle accident as aforesaid, the plaintiff has or may suffer a severe loss of earnings and impairment of his earning capacity and power, and this loss of income is likely to continue for an indefinite time into the future.

9. As a further result of the motor vehicle accident as aforesaid, the plaintiff has suffered and will in the future suffer great pain and suffering, discomfort, embarrassment, mental anguish, emotional distress, and his ability to enjoy the pleasures of life has been and may be in the future interrupted and impaired.

WHEREFORE, the plaintiff, Derrick Bradley demands judgment against the defendant, in a sum in excess of Fifty Thousand Dollars (\$50,000.00) plus interest and costs.

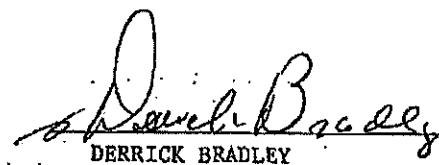
PASQUARELLA, KUNNEL & POMO, P.C.

BY: 
DENNIS A. POMO, ESQUIRE
Attorney for Plaintiff

VERIFICATION

DERRICK BRADLEY hereby states that he is the plaintiff in the foregoing action and verifies that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 PA. C.S. 4904 relating to unsworn falsification to authorities.

8/24/11
DATE


Derrick Bradley
DERRICK BRADLEY